

1 HANSON BRIDGETT LLP
 KURT A. FRANKLIN, SBN 172715
 2 kfranklin@hansonbridgett.com
 LISA M. POOLEY, SBN 168737
 3 lpooley@hansonbridgett.com
 SAMANTHA WOLFF, SBN 240280
 4 swolff@hansonbridgett.com
 RUSSELL C. PETERSEN, SBN 264245
 5 russ.petersen@hansonbridgett.com
 CANDICE P. SHIH, SBN 294251
 6 cshih@hansonbridgett.com
 425 Market Street, 26th Floor
 7 San Francisco, California 94105
 Telephone: (415) 777-3200
 8 Facsimile: (415) 541-9366

9 HANSON BRIDGETT LLP
 TYSON M. SHOWER, SBN 190375
 10 tshower@hansonbridgett.com
 LANDON D. BAILEY, SBN 240236
 11 lbailey@hansonbridgett.com
 500 Capitol Mall, Suite 1500
 12 Sacramento, California 95814
 Telephone: (916) 442-3333
 13 Facsimile: (916) 442-2348

14 OTTEN LAW, PC
 VICTOR OTTEN, SBN 165800
 15 vic@ottenlawpc.com
 KAVITA TEKCHANDANI, SBN 234873
 16 kavita@ottenlawpc.com
 3620 Pacific Coast Highway, #100
 17 Torrance, California 90505
 Telephone: (310) 378-8533
 18 Facsimile: (310) 347-4225

19 Attorneys for Plaintiffs
 CORY SPENCER, DIANA MILENA
 20 REED, and COASTAL PROTECTION
 21 RANGERS, INC.

22 **UNITED STATES DISTRICT COURT**
 23 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**
 24

25 CORY SPENCER, an individual;
 26 DIANA MILENA REED, an
 individual; and COASTAL
 27 PROTECTION RANGERS, INC., a
 28 California non-profit public benefit

CASE NO. 2:16-cv-02129-SJO (RAOx)
**STIPULATION EXTENDING
 DEADLINE FOR JOINT WITNESS
 LIST, JOINT EXHIBIT LIST, AND
 MEMORANDA OF CONTENTIONS
 OF FACT AND LAW**

Case No. 2:16-cv-02129-SJO (RAOx)

STIPULATION EXTENDING DEADLINE FOR JOINT WITNESS LIST, JOINT EXHIBIT LIST, AND
 MEMORANDA OF CONTENTIONS OF FACT AND LAW

1 corporation,

2 Plaintiffs,

3 v.

4 LUNADA BAY BOYS; THE
5 INDIVIDUAL MEMBERS OF THE
6 LUNADA BAY BOYS, including but
7 not limited to SANG LEE, BRANT
8 BLAKEMAN, ALAN JOHNSTON
9 AKA JALIAN JOHNSTON,
10 MICHAEL RAE PAPAYANS,
11 ANGELO FERRARA, FRANK
12 FERRARA, CHARLIE FERRARA,
13 and N. F.; CITY OF PALOS VERDES
ESTATES; CHIEF OF POLICE JEFF
KEPLEY, in his representative
capacity; and DOES 1-10,

14 Defendants.

Complaint Filed: March 29, 2016
Trial Date: December 12, 2017

15
16 WHEREAS Local Rule 16-2 requires a Meeting of Counsel Before Final
17 Pretrial Conference (“the L.R. 16-2 Meeting”) at “least forty (40) days before the
18 date set for the Final Pretrial Conference, [where] lead trial counsel for the parties
19 shall meet in person and accomplish” several tasks related to preparation for trial;

20 WHEREAS the Final Pretrial Conference is set for November 27, 2017, and
21 accordingly the L.R. 16-2 Meeting was previously set for October 18, 2017;

22 WHEREAS the parties previously stipulated to an extension of the deadline
23 for the L.R. 16-2 Meeting through and until Thursday, November 10;

24 WHEREAS the Court entered an order extending the L.R. 16-2 Meeting until
25 November 10 [See Docket No. 497];

26 WHEREAS the deadlines for filing the Memoranda of Contentions of Facts
27 and Law, the Joint Witness List, and the Joint Exhibit List are currently set for
28

1 Monday, November 6, 2017;

2 WHEREAS the requirements of the L.R. 16-2 Meeting include disclosing and
3 discussing issues related to the Memoranda of Contentions of Facts and Law, the
4 Joint Witness List, and the Joint Exhibit List prior to completing and submitting
5 same;

6 WHEREAS the parties seek to extend the deadline for filing the Memoranda
7 of Contentions of Facts and Law, the Joint Witness List, and the Joint Exhibit List
8 until Wednesday, November 15, to allow them sufficient time to meet and confer
9 pursuant to L.R. 16-2;

10 WHEREAS there have been no prior requests for extensions of the deadlines
11 to file the Memoranda of Contentions of Facts and Law, the Joint Witness List, and
12 the Joint Exhibit List;

13 WHEREAS no other pre-trial deadlines are affected by this stipulation.

14
15 THEREFORE, IT IS HEREBY STIPULATED AMONG THE PARTIES
16 THAT:

17 1. The deadline for filing the Memoranda of Contentions of Facts and
18 Law, the Joint Witness List, and the Joint Exhibit List, currently set for November 6,
19 2017, shall be extended through and until Wednesday November 15, 2017.

20
21 Pursuant to L.R. 5-4.3.4 all signatories listed below concur with the filing's
22 content and have authorized the filing of this stipulation.

23
24 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.
25
26
27
28

1 DATED: November 1, 2017

HANSON BRIDGETT LLP

2
3
4 By: /s/ Russell C. Petersen

KURT A. FRANKLIN

5 SAMANTHA D. WOLFF

6 RUSSELL C. PETERSEN

7 Attorneys for Plaintiffs

8 CORY SPENCER, DIANA MILENA

9 REED, and COASTAL PROTECTION

RANGERS, INC.

10
11 DATED: November 1, 2017

LAW OFFICES OF MARK C. FIELDS,
APC

12
13
14 By: /s/ Mark C. Fields

15 MARK C. FIELDS

16 Attorney for Defendant ANGELO

FERRARA

17
18 DATED: November 1, 2017

LAW OFFICES OF J. PATRICK CAREY

19
20 Bv: /s/ J. Patrick Carey

J. PATRICK CAREY

21 Attorney for Defendant

22 ALAN JOHNSTON

23 DATED: November 1, 2017

HAVEN LAW

24
25 Bv: /s/ Peter T. Haven

PETER T. HAVEN

26 Attorney for Defendant

27 MICHAEL R. PAPAYANS

1 DATED: November 1, 2017

VEATCH CARLSON, LLP

2

3

Bv: /s/ Richard P. Dieffenbach

4

RICHARD P. DIEFFENBACH

5

Attorney for Defendant

BRANT BLAKEMAN

6 DATED: November 1, 2017

BREMER WHYTE BROWN &
O'MEARA, LLP

7

8

9

Bv: /s/ Alison K. Hurley

10

ALISON K. HURLEY

Attorney for Defendants

11

CHARLIE FERRARA and

FRANK FERRARA

12

13 DATED: November 1, 2017

LEWIS BRISBOIS BISGAARD &
SMITH LLP

14

15

Bv: /s/ Tera A. Lutz

16

TERA A. LUTZ

Attorney for Defendant

17

SANG LEE

18

19 DATED: November 1, 2017

KUTAK ROCK LLP

20

21

Bv: /s/ Edwin J. Richards

22

EDWIN J. RICHARDS

Attorney for Defendants

23

CITY OF PALOS VERDES ESTATES

and CHIEF OF POLICE JEFF KEPLEY

24

25

26

27

28